

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

<p>KATE WEISSMAN,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>UNITED HEALTHCARE INSURANCE COMPANY, UNITED HEALTHCARE SERVICE, LLC, AND INTERPUBLIC GROUP OF COMPANIES, INC. CHOICE PLUS PLAN,</p> <p style="text-align: center;">Defendants.</p>	<p><b>CIVIL ACTION NO. 1:19-cv-10580</b></p> <p><b>Consolidated with      1:19-cv-12224; and</b> <b>Consolidated with      1:19-cv-12239</b></p> <p><b><u>CLASS ACTION</u></b></p>
<p>RICHARD COLE,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>UNITED HEALTHCARE INSURANCE COMPANY,</p> <p style="text-align: center;">Defendants.</p>	<p>CIVIL ACTION NO. 1:19-cv-12224</p>
<p>ZACHARY RIZZUTO,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>UNITED HEALTHCARE INSURANCE COMPANY, UNITED HEALTHCARE SERVICE, INC., and THE HERTZ CUSTOM BENEFIT PROGRAM,</p> <p style="text-align: center;">Defendants.</p>	<p>CIVIL ACTION NO. 1:19-cv-12239</p>

**NOTICE OF SETTLEMENT AND PROPOSED DEADLINE TO FILE**

**MOTION FOR PRELIMINARY APPROVAL**

Plaintiffs Kate Weissman, Richard Cole, and Zachary Rizzuto (together, “Plaintiffs”) and Defendants UnitedHealthcare Insurance Company, UnitedHealthcare Services, LLC, Interpublic Group of Companies, Inc. Choice Plus Plan and The Hertz Custom Benefit Program (together, “Defendants”), respectfully submit this Notice of Settlement and Proposed Deadline to File Motion for Preliminary Approval. In support thereof the parties state as follows:

1. The parties have reached a full and complete settlement of these matters, subject to the Court’s approval. The parties are working on documenting the settlement in a full and complete written Settlement Agreement. The parties anticipate that this documentation will be completed within the next forty-five (45) days.

2. The parties request that the Court enter an Order setting April 14, 2025 as the Deadline for Plaintiffs to File a Motion for Preliminary Approval of the Settlement.

Dated: January 21, 2025

PLAINTIFFS,

KATE WEISSMAN, RICHARD COLE and  
ZACHARY RIZZUTO, Plaintiffs and the  
Putative Class

By Their Attorneys,

By: /s/ Lisa S. Kantor  
Lisa S. Kantor, *Pro Hac Vice*  
Timothy J. Rozelle, *Pro Hac Vice*  
KANTOR & KANTOR, LLP  
9301 Corbin Avenue  
Northridge, CA 91324  
Telephone: (818) 886-2525  
Facsimile: (818) 350-6272  
lkantor@kantorlaw.net  
trozelle@kantorlaw.net

Mala M. Rafik  
ROSENFELD & RAFIK, P.C.  
184 High Street, Suite 503  
Boston, MA 02110  
Telephone: (617) 723-7470  
Facsimile: (617) 227-2843  
mmr@rosenfeld.com

Richard T. Collins, *Pro Hac Vice*  
Damon D. Eisenbrey, *Pro Hac Vice*  
ARNALL GOLDEN GREGORY LLP  
2100 Pennsylvania Avenue, NW  
Suite 350S  
Washington, DC 20037  
Telephone: (202) 677-4917  
Facsimile: (202) 677-4047  
Rich.Collins@agg.com  
Damon.Eisenbrey@agg.com

Attorneys for Plaintiffs Kate Weissman and  
Zachary Rizzuto, and the Putative Class

Respectfully submitted,

DEFENDANTS,

UNITED HEALTHCARE INSURANCE  
COMPANY, UNITED HEALTHCARE  
SERVICE, LLC, INTERPUBLIC GROUP  
OF COMPANIES, INC., CHOICE PLUS  
PLAN, and THE HERTZ CUSTOM  
BENEFIT PROGRAM, Defendants

By Their Attorneys,

By: /s/ Gregory F. Noonan  
Gregory F. Noonan  
Gregory F. Noonan (BBO # 651035)  
HOGAN LOVELLS US LLP  
125 High Street., 20th Floor  
Boston, MA 02110  
Telephone: (617) 371-1000  
Facsimile: (617) 371-1037  
gregory.noonan@hoganlovells.com

Of Counsel:  
Peter H. Walsh  
HOGAN LOVELLS US LLP  
80 South Eighth Street, Suite 1225  
Minneapolis, MN 55402  
Telephone: (612) 402-3017  
Facsimile: (612) 339-5167  
peter.walsh@hoganlovells.com

Briana L. Black  
HOGAN LOVELLS US LLP  
555 Thirteenth Street, NW Washington, DC 20004  
Telephone: (202) 637-6657  
Facsimile: (202) 637-5910  
briana.black@hoganlovells.com

Michael M. Maddigan  
Jordan D. Teti  
HOGAN LOVELLS US LLP  
1999 Avenue of the Stars, Suite 1400

Stephanie A Casey, *Pro Hac Vice*  
COLSON HICKS EIDSON  
255 Alhambra Circle, Penthouse  
Coral Gables, FL 33134  
Telephone: (305) 476-7400  
Facsimile: (305) 476-7444  
scasey@colson.com

Los Angeles, CA 90067  
Telephone: (310) 785-4727  
Facsimile: (310) 785-4601  
michael.maddigan@hoganlovells.com  
jordan.teti@hoganlovells.com

Maria Dolores Garcia, *Pro Hac Vice*  
Robert John Neary, *Pro Hac Vice*  
KOZYAK TROPIN &  
THROCKMORTON LLP  
2525 Ponce de Leon Blvd., 9th Floor  
Coral Gables, FL 33134  
Telephone: (305) 372-1800  
Facsimile: (305) 372-3508  
mgarcia@kttlaw.com  
rn@kttlaw.com

*Attorneys for Plaintiff Richard Cole and the  
Putative Class*

**Certificate of Service**

I certify that on, a copy of this document was electronically filed through the ECF system and will be sent electronically to all persons identified in the Notice of Electronic Filing, and that paper copies will be sent to those indicated as nonregistered participants.

Dated: January 21, 2025

By: /s/ Lisa S. Kantor  
Lisa S. Kantor